

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Arelis A. Pizarro-Williams
Antonie S. Williams

Case No.: 20-12225(ELF)

Debtor (s)

Chapter 7

MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

Arelis A. Pizarro-Williams and Antonie S. Williams, hereinafter referred to as "Debtors" moves this Honorable Court for an Order allowing Debtors' case to be converted from Chapter 7 to Chapter 13 and aver the following:

1. Debtors filed for relief under Chapter 7 of the Bankruptcy code on May 5, 2020.
2. Subsequent to the filing, the Debtors fell behind in their mortgage payments due to Debtor husband losing his employment.
3. The Debtors both have permanent employment and can resume regular monthly mortgage payments on a consistent basis.
4. The Debtors wish to convert their bankruptcy to a Chapter 13 to repay any and all mortgage arrears due and owing.
5. Debtor shall additionally file a Chapter 13 Plan, and the necessary Amended Schedules to proceed under Chapter 13 of the Bankruptcy Code.

WHEREFORE, the Debtor requests an Order allowing his case to be converted from Chapter 7 to Chapter 13 Bankruptcy.

Dated: July 10, 2020

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street, Suite #502
Philadelphia, PA 19107